National Wildlife Federation
11100 Wildlife Center Drive • Reston, VA 20190-5362 • 703-438-6000

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Scientific Advisory Board for the Environmental Protection Agency

On behalf of the National Wildlife Federation, I would like to provide these comments on the Science Advisory Board's (SAB) draft review of EPA's *2014 Framework for Assessing Biogenic CO_2 Emissions from Stationary Sources (Framework).* Given the urgency of climate change, our organization sees a successful carbon accounting mechanism as one that prioritizes carbon benefits that are realized in the short term over those realized in the distant future. We strongly believe that the EPA's *Framework* should take into context our climate systems and pressing need for reducing emissions in the short term. While the SAB does recognize that time frames make a difference, stating that biogenic material sequesters CO_2 "over time frames of years or decades," the difference of years and decades can be pivotal in our ability to mitigate tipping points and the worse impacts of climate change. Take the instance of biomass in the UK, where subsidies are driving large-scale consumption of wood pellets imported from the southeast US.[1] Our analysis shows that biomass from southeastern forests takes 35-50 years to pay off its carbon debt.[2] It is irresponsible to promote energy systems that produce emissions that won't be balanced out for 50 years. And it's even more problematic to put this on a level playing field with energy systems that reduce emissions with more immediate term benefits.

The Biogenic Carbon Panel's (Panel) comments on the EPA's Biogenic Assessment Factor (BAF) as well as the Panel's proposed BAF methodology seem to indicate that the Panel too values distinguishing the timeframe of impacts. However, the report outsources the BAF timeframe selection to policy-makers, stating only that carbon accounting should take into account a timeframe in which 95% of carbon fluxes are experienced. This opens the door to choosing policies that undermine a stable climate if a distant point in time is chosen to calculate the BAF. Short-term time frames are fundamental to the success of the *Framework* in meeting climate goals. This is within the scope of the EPA's charge for the SAB, which asks "What criteria could be used when considering different temporal scales". Climate impacts, now and in the future, should certainly be valid criteria, if not the main one. Additionally, the charge has language that factors in earth systems, stating "Changes in biophysical and economic conditions over time may affect or differ from those in future anticipated baseline and scenario estimates." The effect of biophysical conditions on scenario estimates certainly seems to open the door for evaluating tipping points in our climate systems. Again, short-term time frames are fundamental to a successful BAF, and the SAB's recommendations should stress this.

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[1] U.S. Energy Information Administration. 2015. *UK's renewable energy targets drive increases in U.S. wood pellet exports*. https://www.eia.gov/todayinenergy/detail.php?id=20912

[2] Colnes, A., Doshi, K., Emick, H., Evans, A., Perschel, R., Robards, T., Saah, D., Sherman, A. 2012. *Biomass Supply and Carbon Accounting for Southeastern Forests*. National Wildlife Federation and Southern Environmental Law Center. http://www.nwf.org/~/media/PDFs/Global-Warming/NWF-SE-Carbon-Study.ashx

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The Panel's decision to provide information on a broad spectrum of impacts using different timeframes—without sending a clear message on the importance of near-term reductions—leaves the BAF to be interpreted by policy makers, whether on a state-by-state level or by federal entities. It is almost inevitable that different BAF timeframes will be selected. This can do more than jeopardize science-driven policy, it can provide mixed signals to industry. The SAB can preempt this problem by sending a strong signal to industry and policy makers alike of how treatment of biogenic carbon can play a role in mitigating climate change through near-term carbon pollution reductions.

We write these comments on the heels on Hurricane Harvey, which is being recognized as one of the worst flood disasters in US history. Many species of wildlife are already facing the effects of climate change, from the brook trout that are losing valuable habitat as cold, fast flowing streams become shallower and warmer, to the moose in the northeastern US that are declining as tick populations boom due to shorter winters and less snow cover, to the loggerhead sea turtles that are losing critical nesting habitat on east coast beaches as sea levels continue to rise.[3, 4] We have entered the era where real climate impacts are being borne on people and wildlife—the urgency for the EPA to establish policies that expeditiously mitigate climate change only grows greater each day. The SAB can do this by making sure the Panel's proposed BAF methodology emphasizes temporal trade-offs and near-term benefits.

Max Broad

Sustainable Bioenegy Specialist

National Wildlife Federation

[3] U.S. Department of the Interior. *9 animals that are feeling the impacts of climate change*. https://www.doi.gov/blog/9-animals-are-feeling-impacts-climate-change
[4] United States Geological Surey. *Warmer waters mean more driving, less fishing*. https://nccwsc.usgs.gov/sites/default/files/files/NCCWSC_Story_BrookTrout_0.pdf